

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Afraaz R. Irani, M.D.,)	C/A No. 3:14-cv-03577-CMC-KDW
)	
Plaintiff,)	
)	
vs.)	PLAINTIFF'S RESPONSES TO
)	LOCAL CIVIL RULE 26.01
Palmetto Health; University of South)	INTERROGATORIES
Carolina School of Medicine; David E.)	
Koon, Jr., M.D., in his individual)	
capacity; and John J. Walsh, IV, M.D.,)	
in his individual capacity,)	
)	
Defendants.)	
_____)	

Plaintiff, Afraaz R. Irani, M.D., by and through his undersigned counsel, hereby answers the Court's standard interrogatories pursuant to Local Civil Rule 26.01, D.S.C., as follows:

INTERROGATORY (A):

State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None.

INTERROGATORY (B):

As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff has requested a non-jury trial, as have Defendants.

INTERROGATORY (C):

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent,

subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Not applicable.

INTERROGATORY (D):

State the basis for asserting your claim in the division in which it was filed.

ANSWER: This case was originally filed in the Richland County Court of Common Pleas because one or more of the Defendants live in Richland County, and most of the wrongful conduct occurred within Richland County. Defendants removed the case to the Columbia Division of this Court, which is the proper venue. Plaintiff does not contest Defendants' right to remove the action or the process by which Defendants effected the removal.

INTERROGATORY (E):

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: This action is not related to any other matter filed in this District.

* * *

Respectfully submitted,

s/ David E. Rothstein

David E. Rothstein, Fed. ID No. 6695

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September 10, 2014

Greenville, SC.